

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:19-MC-00028**

FORTITUDE FINANCIAL )  
INVESTMENTS, INC., )  
                        )  
                        )  
Plaintiff,             )  
v.                      )  
                        )  
LSTAR MANAGEMENT, LLC, )  
                        )  
                        )  
Defendant.            )

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**RECEIVER'S MOTION TO  
APPROVE SETTLEMENT AND  
RELEASE AGREEMENT**

Margaret R. Westbrook, Esq. (“Receiver”), as Receiver for LStar Management, LLC (“Management”), by and through undersigned counsel, hereby moves the Court for an Order approving the proposed Settlement and Release Agreement between Patrick Sullivan, William Hampton Pitts, and Rachel Vradenburgh (the “Employees”), LStar Development Group, Inc. and Landquest Legacy of North Carolina, LLC and its subsidiary and affiliate companies (collectively “Development”), Kyle V. Corkum (“Corkum”), Management, and Receiver (the Employees, Development, Corkum, Management, and the Receiver may be referred to collectively herein as the “Parties” or individually as a “Party”).

The proposed Settlement and Release Agreement is entered into pursuant to the authority vested in Receiver via the Court’s prior Order appointing Receiver on March 11, 2020 (ECF No. 9). For the reasons set forth in the accompanying brief in support, Receiver requests that the Court enter an Order approving the proposed Settlement and Release Agreement.

Respectfully submitted, this the 26th day of May, 2022.

**K&L GATES LLP**

*/s/ Margaret R. Westbrook*

Margaret R. Westbrook  
N.C. State Bar No. 23327  
K&L Gates LLP  
4350 Lassiter at North Hills Ave., Suite 300  
Raleigh, North Carolina 27609  
Telephone: (919) 743-7311  
Fax: (919) 516-2111  
[Margaret.Westbrook@klgates.com](mailto:Margaret.Westbrook@klgates.com)  
*Counsel to Margaret R. Westbrook, Esq., Receiver for  
LStar Management, LLC*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of this document to be filed electronically through CM/ECF and, thus, to be served by electronic notification on those parties properly registered for electronic service through this Court's CM/ECF system, including the following:

James S. Livermon, III  
Womble Bond Dickinson (US) LLP  
555 Fayetteville St., Suite 1100  
Raleigh, NC 27601  
Email: charlie.livermon@wbd-us.com  
*Counsel for Fortitude Financial Investments, Inc.*

Lisa P. Sumner  
Nexsen Pruet  
4141 Parklake Avenue, Suite 200  
Raleigh, NC 27612  
Email: lsumner@nexsenpruet.com  
*Counsel for LStar Development Group, Inc.*

Byron L. Saintsing  
Smith Debnam Narron Drake Saintsing & Myers, LLP  
Post Office Box 17610  
Raleigh, NC 27619-6010  
Email: bsaintsing@smithdebnamlaw.com  
*Counsel for Milone & MacBroom, Inc.*

Donald G. Hunt, Jr.  
Akins Hunt Adkins Law  
570 New Waverly Place, Suite 240  
Cary, NC 27518  
Email: dgh@akinshunt.com  
*Counsel for Sherry K. Corkum*

Kristen Atkins Lee  
Akins Hunt Adkins Law  
570 New Waverly Place, Suite 240  
Cary, NC 27518  
Email: kal@akinshunt.com  
*Counsel for Nichols Street, LLC*

Respectfully submitted this 26th day of May, 2022.

**K&L GATES LLP**

/s/ Margaret R. Westbrook

Margaret R. Westbrook

N.C. State Bar No. 23327

K&L Gates LLP

4350 Lassiter at North Hills Ave., Suite 300

Raleigh, North Carolina 27609

Telephone: (919) 743-7311

Fax: (919) 516-2111

Margaret.Westbrook@klgates.com

*Counsel to Margaret R. Westbrook, Esq., Receiver for  
LStar Management, LLC*